

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JOHN P. JOHNSON,
Plaintiff,

v.

PORTFOLIO RECOVERY
ASSOCIATES, LLC,
Defendant.

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Civil Action No.: SA15:CA-0024-RP

**DEFENDANT PORTFOLIO RECOVERY ASSOCIATES, LLC'S
EXPERT WITNESS LIST**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Defendant Portfolio Recovery Associates, LLC, and files this Expert Witness List:

A. Testifying Experts Who May Offer Testimony

1. Portfolio Recovery Associates, LLC
Corporate Representative
c/o Robbie Malone
Robbie Malone, P.L.L.C.
Northpark Central, Suite 1850
8750 N. Central Expressway
Dallas, TX 75231
Defendant.

PRA's Corporate Representative may testify as to the subject of their knowledge and experience in industry standards for companies retained to maintain property secured by financial institutions.

B. Other Designations and Reservations

1. Without waiving their right to challenge qualifications or the reliability of their opinions and mental impressions, Defendant Portfolio Recovery Associates, LLC, reserves the right to elicit any testimony, on cross-examination or otherwise, from any individual who might be or who has been designated as an expert witness by the Plaintiff in this matter.

DEFENDANT'S EXPERT WITNESS DESIGNATION - Page 1

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2. Defendant Portfolio Recovery Associates, LLC, also reserves the right to amend or supplement this Expert Designation based on the trial of this matter, for purposed of rebuttal and other evidentiary rulings.

Respectfully submitted,

ROBBIE MALONE, PLLC

/s/ Robbie Malone
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been forwarded to Plaintiff via **CMRRR** and **1st Class U.S. Mail** on this 14th day of August, 2015.

John P. Johnson
Plaintiff Pro Se
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/s/ Robbie Malone
ROBBIE MALONE